

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

UNITED STATES SOCCER FEDERATION,
INC.,

Plaintiff,

v.

UNITED STATES WOMEN’S NATIONAL
SOCCER TEAM PLAYERS ASSOCIATION,

Defendant.

Case No. 1:16-cv-01923

Hon. Sharon Johnson Coleman

AGREED MOTION FOR DISMISSAL AND ENTRY OF JUDGMENT

Plaintiff United States Soccer Federation (“US Soccer”) and Defendant United States Women’s National Soccer Team Players Association (“WNTPA”), pursuant to Rule 42(a)(2), Rule 54 and Rule 58 of the Federal Rules of Civil Procedure and in view of the Court’s June 3, 2016 Memorandum Opinion and Order (“Opinion and Order”) granting US Soccer’s motion for summary judgment on its Second Claim for Declaratory Relief and the parties’ agreement with respect to US Soccer’s First Claim for Relief for Anticipatory Breach of Contract, hereby move for dismissal of Plaintiff US Soccer’s First Claim for Relief and entry of judgment as follows:

1. Judgment shall be entered in favor of Plaintiff US Soccer on its Second Claim for Declaratory Relief for the reasons set forth in the Court’s Opinion and Order.
2. Pursuant to the agreement of the parties, Plaintiff’s First Claim for Relief for Anticipatory Breach of Contract is hereby dismissed as moot for the reasons set forth in the Court’s Opinion and Order.
3. Attached as Exhibit A and lodged with the Court is a form of [Proposed] Judgment agreed to by the parties.

4. Pursuant to the agreement of the parties, each party shall bear its own attorneys' fees and costs, and no appeal will be taken from the Court's Opinion and Order or the entry of Judgment.

Dated: July 14, 2016

Respectfully submitted,

By: /s/ Matthew W. Walch
Matthew W. Walch
LATHAM & WATKINS LLP
330 North Wabash Avenue, Suite 2800
Chicago, Illinois 60611
(312) 876-7700

Kathryn H. Ruemmler (*pro hac vice*)
LATHAM & WATKINS LLP
555 Eleventh St. NW, Ste. 1000
Washington, DC 20004

Russell F. Sauer, Jr. (*pro hac vice*)
Amy C. Quartarolo (*pro hac vice*)
Michael Jaeger (*pro hac vice*)
LATHAM & WATKINS LLP
355 South Grand Avenue
Los Angeles, California 90071
(213) 485-1234

Attorneys for Plaintiff
United States Soccer Federation, Inc.

Dated: July 14, 2016

Respectfully submitted,

By: /s/ Samuel Mendenhall
WINSTON & STRAWN LLP
35 West Wacker Drive Chicago, IL 60601
(312) 558-5600

Jeffrey L. Kessler (*pro hac vice*)
David G. Feher (*pro hac vice*)
WINSTON & STRAWN LLP
200 Park Avenue
New York, NY 10166-4193 (212) 294-6700

Attorneys for Defendant United States Women's
National Soccer Team Players Association